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ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Raymond Collins; Laura Fankuchen; )  
Brandon Ferguson; Brian Hansen; Erin )  
Kurpinski; Richard Martinez; Raymundo )  
Navejar; Caroline Meyer; Allison Power; )  
Jay Queniahah; Jason Ratner; Esperanza )  
Rico; Jessica Rodriguez; Steven Smith; )  
Rosemary Viramontes; Nicholas )  
Wheeler; Dana Withaegar, )

Plaintiffs,

vs.

WALGREEN CO., d/b/a WALGREENS; )  
EMPLOYEE(S)/AGENT(S) DOES 1- 10; and )  
ROE CORPORATIONS 11- 20, inclusive, )

Defendants.

Case No. 2:14-CV-01587-JAD-VCF

**AMENDED STIPULATION AND  
ORDER TO STAY PROCEEDINGS  
FOR SIXTY (60) DAYS PENDING  
THE RESOLUTION OF THIS  
MATTER**

The parties, by and through their respective counsel of record, hereby stipulate and request that the Court stay all proceedings in this case for a period of sixty (60) days while the parties finalize their settlement of this case and prepare a stipulation of dismissal with prejudice.

This request for a stay is based upon the following:

1. Plaintiffs' Complaint was initially filed on September 26, 2014.
2. Defendants filed a motion to dismiss this case on February 16, 2015 (Doc. No. 20).
3. The Court set a hearing for defendants' motion to dismiss for May 11, 2015 at 1:30 p.m..
4. Since the filing of defendants' motion to dismiss, the parties have engaged in

successful settlement negotiations and have reached an agreement to settle this matter.

6. The parties are currently reducing the terms of their settlement agreement to writing and working cooperatively to prepare a stipulation of dismissal for filing with the Court.

7. Based upon the foregoing, the parties request the Court stay all proceedings for a period of sixty (60) days to allow the parties to finalize the terms of their settlement agreement and prepare a stipulation of dismissal. The parties request all proceedings remain stayed until **May 19, 2015**.

8. The parties jointly stipulate that defendants' motion to dismiss (Doc. No. 20) is deemed withdrawn and further request that the Court vacate the hearing set for May 11, 2015 at 1:30 p.m. on defendants' motion to dismiss.

WHEREFORE, for good cause and for the reasons set forth above, the parties respectfully request that the Court stay the proceedings in this matter until **May 19, 2015** and vacate the hearing on May 11, 2015 at 1:30 p.m.

DATED this 19<sup>th</sup> day of March, 2015.

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SEYFARTH SHAW LLP

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Attorneys for Defendants

**ORDER**

**IT IS SO ORDERED.**

DATE: March 23, 2015

  
UNITED STATES DISTRICT COURT JUDGE